

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

William Steven Stanaitis,
Penny Mifflin Stanaitis,

Debtors.

Case No. 23-12187-pmm

Chapter 13

Related to ECF No. 29

**Debtors' Objection to Motion for Relief from Stay
filed by Wells Fargo Bank, N.A.**

AND NOW, Debtors William Steven Stanaitis and Penny Mifflin Stanaitis, by and through their attorney, hereby object to the Motion for Relief from Stay filed by Wells Fargo Bank, N.A. Because the purported arrearage that gave rise to the Motion can be timely paid directly or through the chapter 13 plan, no grounds for relief exist and the Motion must be denied.

NOW, THEREFORE, the Debtors ask this Court to deny the Motion in the form of order attached and to grant such other and further relief in their favor as may be necessary and proper under the law.

Date: November 27, 2023

CIBIK LAW, P.C.
Counsel for Debtor

By: /s/ Michael A. Cibik
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Certificate of Service

I certify that on this date I caused a true and correct copy of the Debtors' Objection to Motion for Relief from Stay filed by Wells Fargo Bank, N.A. to be served on all parties on the clerk's service list through the CM/ECF system.

Date: November 27, 2023

/s/ Michael A. Cibik
Michael A. Cibik

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re:

William Steven Stanaitis,
Penny Mifflin Stanaitis,

Debtors.

Case No. 23-12187-pmm

Chapter 13

Related to ECF No. 29

Order Denying Motion for Relief from Stay filed by Wells Fargo Bank, N.A.

AND NOW, upon consideration of the Motion for Relief from Stay filed by Wells Fargo Bank, N.A., and the Debtors' objection thereto, and after notice and hearing, it is hereby **ORDERED** that the Motion is **DENIED**.

Date:

Patricia M. Mayer
U.S. Bankruptcy Judge